



## Privacy Notice

### Privacy Notice for Falck Danmark A/S, Covid-19 antigen-, antibody-, NAAT- and PCR-test – Danish Airports

In connection with your Covid-19 test, Falck Denmark A/S collects and processes – as data controller – certain personal data about you.

In this Privacy Notice, we describe our processing, use and transfer of personal data.

#### **A. Purpose**

We collect and process personal data for the following purposes:

1. To perform a Covid-19 test including providing you with the test result as well as information on how to act in case of a positive result.
2. To send you an sms-notification when your test result is available.
3. To provide a certificate of negative or positive test result for the use of you being able to document a negative test to a public authority or others if needed by you.
4. To prepare a medical record in accordance with our journaling obligation under Danish law.
5. To pass on information to the Danish Medical Sector Research Institute ('Statens Serum Institut' ('SSI')), for the purpose of securing satisfactory data for contamination tracking and investigation, which will be used to assess the national level of contamination and for SSI to make your test result available to yourself and relevant healthcare professionals on Sundhed.dk.
6. **Only if you are tested positive in Copenhagen airport:** To transfer your information to the Municipality of Copenhagen, for them to assist with isolation possibilities, should this be relevant for you.
7. **If you are tested positive for COVID-19:** to pass on information to the Danish Department of Patient Safety ('Styrelsen for Patientsikkerhed') in case you are tested positive, to allow them to investigate possible contaminations in your close relations to prevent further spreading of the COVID-19 virus.
8. **Only for Copenhagen airport:** If travelling to the Chinese regions: Transfer data to the airport doctor, to analyze your test sample and give Falck a certificate of the test result to give to you, to allow you to travel to the Chinese regions, insofar the result is negative.
9. To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (e.g., EU Data Protection Regulation or The Danish Executive Order of Journalkeeping (Journalføringsbekendtgørelsen), e.g:
  - a. Documentation requirements
  - b. Compliance with basic principles for processing of personal data and legal basis for processing.
  - c. Implementation and maintenance of technical and organizational security measures, including but not limited to prevent unauthorized access to systems and information, prevent receipt or distribution of malicious code, termination of denial-of-service-attacks and damage to computer systems and electronical communication systems.
  - d. Investigation of a suspected or known security breaches and reporting of such breach to individuals and authorities
  - e. To process and respond to requests and complaints from data subjects and others
  - f. Handling of inspections and requests from authorities
  - g. Management of disputes with data subjects and third parties.
  - h. Anonymization of data to create statistic and scientific research

Your personal information will not be shared, sold or disclosed other than as described in this Privacy Notice.

When we collect personal information directly from you, it is necessary for us to perform a Covid-19 test on you and provide you with the test result and relevant information in connection hereto. You are not obligated to provide the personal information to us. If you do not provide us with the personal information necessary as described above, the consequence will be that we cannot perform a Covid-19 test on you.

**B. Processed personal data**

We collect and process the following types of personal information about you:

General categories of personal data

- Contact information (name, e-mail and phone number).
- Covid-19 contamination status if negative or inconclusive.
- Payment information, if you pay for the test yourself.
- Passport number and date of expiry of the passport if leaving Denmark (incl. transit in Danish airports).
- Date of Birth if leaving Denmark (incl. transit in Danish airports).
- Country or countries you're arriving from.
- Information of you being in close proximity to a contaminated person or not.
- Gender.
- If you do not have a Danish CPR-number, one of the following will be processed:
  - Driver's license number
  - Passport number.

Special categories of personal data

- Health information, Covid-19 contamination status (if positive).
- Social Security Number.
- Genetic data in terms of the genetic material applied to the clinical grafting stick.

**C. The Legal Basis for Processing and retention period of the Personal Information**

The legal basis for processing of your data in relation to the Covid-19 test is the following:

<i><b>Process/Purpose</b></i>	<i><b>Deletion and retention criteria</b></i>	<i><b>Legal basis</b></i>
Payment prior to performing the test, insofar you are paying for the test yourself	No more than 1 month after you received your Covid-19 test result.	GDPR article 6(1)(b) – contractual necessity.
Personal data necessary for us to send you an sms-notification when your test result is available	No more than 1 month after the sms-notification is send.	GDPR article 6(1)(f) – Falck's legitimate interest in notifying you by sms when your test result is available.
Personal data necessary to perform the test and provide test result as well as follow-up information	No more than 1 month after sending information to the Danish Department of Patient Safety.	If the public pays for the test: GDPR article 6(1)(b) – contractual necessity.  If you pay for the test yourself: GDPR article 6(1)(f) – Legitimate interest in performing the Covid-19 test.
Billing information	5 calendar years + current year	GDPR article 6(1)(c) - legal obligation.  The Danish Accounting Act § 10(1).

Genetic data collected by inoculation to determine infection with Covid-19.	No more than 14 days after the test has been performed.	<p>If the public pays for the test: GDPR article 6(1)(b) – contractual necessity.</p> <p>If you pay for the test yourself: GDPR article 6(1)(f) – Legitimate interest in performing the Covid-19 test.</p> <p>GDPR article 9(2)(h) – medical diagnosis and treatment.</p> <p>Consent to treatment as described in the Danish Health Act ('Sundhedsloven'), §15(1).</p>
Data registered in the medical record I (test result, CPR-number etc.)	10 years from the last input in your medical record.	<p>GDPR article 6(1)(c) – legal obligation - and 9(2)(h) – medical diagnosis and treatment.</p> <p>The Danish Executive Order of Journalkeeping ('Journalføringsbekendtgørelsen'), §15(1).</p> <p>Consent to treatment as described in the Danish Health Act ('Sundhedsloven'), §15(1).</p>
Transferring information to the Danish Medical Sector Institute for Research (SSI) for the purpose of tracking the national contamination level and perform contamination investigation and for SSI to make your test result available on sundhed.dk.	No more than 1 month after transferring the information to the Danish medical sector institute for research (SSI)	<p>GDPR article 6(1)(c) – legal obligation - and 9(2)(i) – public interest in the field of public health</p> <p>Executive Order on Notification of COVID-19 § 1(1)</p> <p>The Danish Health Act ('Sundhedsloven'), §43(2)(1).</p>
Storage of data for documentations purposes to prove correct handling of process and legal requirements in relation to the Danish Statute of Limitations.	3 years. See further requirements in this matrix for documentations purposes.	<p>GDPR article 6(1)(f) – legitimate interest ins documenting correct handling of process' and legal requirements.</p> <p>The Danish Statute of Limitations §3(1).</p>
Providing negative test results by text message if it's agreed that you leave the test center prior to the result.	No more than 1 month after sending the text message to you.	GDPR article 6(1)(f) – Legitimate interest in providing you with the test result.
<b>Additional purpose if you are tested positive for COVID-19</b>		
Transferring information to the Danish Department of Patient Safety ('Styrelsen for Patientsikkerhed') for the purpose of tracking possible contamination chains.	No more than 1 month after transferring the information to the Danish Department of Patient Safety.	<p>GDPR article 6(1)(c) – legal obligation - and 9(2)(i) – public interest in the field of public health</p> <p>Executive Order on Notification of COVID-19 § 4(1)</p> <p>The Danish Health Act ('Sundhedsloven'), §43(2)(1).</p>

Additional purpose if you are tested positive for COVID-19 in Copenhagen Airport		
Transfer of information to the Municipality of Copenhagen in connection to positive results for the purpose of discussing isolation options, in case you don't have any possibilities yourself	No more than 1 month after sending information to the municipality	GDPR article 6(1)(c) – legal obligation - and 9(2)(i) – public interest  The Danish Health Act ('Sundhedsloven'), §43(2)(2).
Additional purposes for PCR-tests		
Transferring information to lab for the purpose of getting your PCR-test analyzed and supply you with a test certificate, if required by you.	No more than 1 month after sending information to lab	GDPR article 6(1)(b) – contractual necessity and 9(2)(h) – medical diagnosis and treatment  The Danish Health Act ('Sundhedsloven'), §41(2)(1)
Additional purpose if travelling to a Chinese region		
Transfer data to the Airport Doctor to analyze the test sample and provide Falck with a certificate to give to you.	No more than 1 month after sending information to lab	GDPR article 6(1)(b) – contractual necessity and 9(2)(h) – medical diagnosis and treatment  The Danish Health Act ('Sundhedsloven'), §41(2)(1)

For processing's related to the testing based on our legitimate interest, we are basing this on:

- 1) our interest in processing information of you, as we otherwise would not be able to provide you the possibility of a test (relevant if the public pays for your test);
- 2) our interest in notifying you by sms when your test result is available;
- 3) our interest in storing personal data to document correct handling of legal requirements, and;
- 4) our interest in providing you with your test result by SMS.

The processing of the data is thereby not only in our interest, but also in yours

For processing's based on your consent you have a right to withdraw such consent, however this will not affect the processing already incurred prior to withdrawal of the consent. You can withdraw your consent by contacting us on [kvalitet@falck.dk](mailto:kvalitet@falck.dk).

**D. Automated, individual decision making**

Personal data is not used for automated, individual decision making or profiling.

**E. Disclosure of Personal Information**

Your personal information will be disclosed to and shared with the following recipients:

Name	Registration number	Address	Country	Purpose
Statens Serum Institut (the Danish Medical Sector Institute for Research (SSI))	46837428	Artillerivej 5 2300 København S	Denmark	To secure satisfactory data for contamination tracking and

				investigation as well as pandemic research
The Danish CPR-register – The Danish Ministry of Social and Domestic Affairs (Social og Indenrigsministeriet)	33962452	Holmens Kanal 22 1060 København K	Denmark	
Additional transfer if you are tested positive for COVID-19 in Copenhagen Airport				
The municipality of Copenhagen	64942212	Borups Allé 177 DK-2400 Copenhagen	Denmark	To discuss isolation options with you if relevant for you
Additional transfer if you are tested positive for COVID-19				
Styrelsen for Patientsikkerhed	37105562	Islands Brygge 67 2300 København S	Denmark	To conduct contamination-chain investigation.
Additional transfer if travelling to a Chinese region				
Airport Doctor ApS	37174777	Terminal 2, 1. fl. Room 66 Terminalgade 6 DK-2770 Kastrup	Denmark	To analyze the test samples taken by Falck and to provide Falck a test certificate to give to you, allowing you to travel to a Chinese region, if the result is negative.

Beside the above-mentioned recipients, your personal information will be transferred to our data processors and/or sub-processors, being:

Name	Category	Location	Sector	Purpose/description
Marius Pedersen A/S	Data Processor	DK	Renovation	Secure disposal of genetic material
Microsoft Tenant	Data Processor	EU	IT	O365 Cloud Services to transfer information to the Danish Department of Patient Safety (Styrelsen for Patientsikkerhed)
Microsoft Cloud Services	Data Sub-processor	Global	IT	Microsoft cloud set-up*
HCL Denmark	Data Processor	EU	IT	Operational Support
HCL Sweden	Data Processor	EU	IT	Data Centers
HCL Poland	Data Sub-Processor	EU	IT	Database Management
HCL India	Data Sub-Processor	India	IT	Operational Support
KMD A/S	Data Processor	DK	IT	IT system supplier for journaling and data sharing with SSI

Onlinecity.IO ApS	Data Sub-Processor	DK	IT	SMS provider for providing of text messages in relation to negative test results if agreed with you
Link Mobility	Data Processor	DK	IT	SMS provider for providing of sms notification when your test result is available
IP Only	Data Sub-Processor	SE	IT	Support of sms solution
Interexion	Data Sub-Processor	GE	IT	Support of sms solution
Lumen	Data Sub-Processor	ES	IT	Support of sms solution
eShelther	Data Sub-Processor	GE	IT	Support of sms solution
Microsoft Ireland Operations Limited	Data Sub-Processor	EU	IT	Data Center
Microsoft Corporation	Data Sub-Processor	USA	IT	Operational Support
Wipro	Data Processor	India	Finance	Billing Support
Additional Data Processors for people travelling to the Chinese regions				
Falck Healthcare A/S	Data Processor	DK	Health	To assist taking samples on behalf of Falck Danmark A/S

\*Further information on Microsoft's Data Processors can be found at:

<https://servicetrust.microsoft.com/Library?command=Download&downloadType=Document&downloadId=926b2cf5-6b6e-43ca-9bc3-f73e961aad5f>

Further information on legal basis for transferring of data outside EU/EEA can be found at:

[https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_de](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_de)

#### **F. Your rights**

Within the limitations of the law, you have the right to:

- right to access to personal data;
  - You have the right to, free of charge, receive all information which is processed of you in an easily readable and understandable way.
- right to rectify incorrect information;
  - You have the right to correct any processed data which is incorrect.
- right to deletion of information;
  - You have the right to request deletion of data processed about you, should we not have a legal basis for continual processing of your data.
- right to restrict the processing of information;
  - You have the right to restrict the access to the data, resulting in the data cannot be processed for any purpose besides storage, unless we can justify continued processing.
- right to data portability, and;
  - You have the right to receive the information processed by you in a structured, commonly used and machine-readable format.
- right to object to the processing of personal data, including automated, individual decisions.

- You have the right to object to a data processing, either entire processing or parts of the processing, where after we cannot continue process the data, unless we can demonstrate a legal basis for the processing, which overrides the objection. This includes objection against any processing including automated and individual decision-making, should this occur.

You can exercise your rights by contacting Falck on the named contact information in section G “Contact details”

You also have a right to lodge a complaint with the supervisory authority in Denmark, ‘Datatilsynet’.

### G. **Contact details**

If you have any questions or comments with respect to the processing of your personal data or you wish to exercise your rights under applicable legislation, please contact us on [kvalitet@falck.dk](mailto:kvalitet@falck.dk) or our data protection officer by emailing to [dpo@falck.com](mailto:dpo@falck.com).

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Date of change	Version	Changes
05/02-2021	V1	Initial Privacy Notice ready for use
19/02-2021	V2	1) Process added to the Privacy Notice in case of travel to the Chinese regions 2) Corrected minor spelling errors
05/03-2021	V3	1) Process added to provide you with a test result on text message if the result is negative 2) Added legal basis for storing data for documentations purposes. 3) Changed transfer to the Danish Department of Patient Safety (‘Styrelsen for Patientsikkerhed’) to only be related to individuals without a Danish CPR-number, due to new requirements.
18/03-2021	V4	1) Removal of section regarding collection of consent on behalf of SSI to make test results available on sunhed.dk
28/05-2021	V5	1) Added purpose – sms notification including addition of relevant data processors and sub processors.
02-11-2021	V6	1) Removed the processing of data in relation to booking of times and removed the booking supplier. 2) Specified that transfer will happen to Styrelsen for Patientsikkerhed, if the testresult is positive. 3) Updated the executive order used in connection to transfer of data to Styrelsen for Patientsikkerhed. 4) Minor corrections to the text

17-11-2021	V7	1) Updated the privacy notice to also include PCR tests based on spit, by removing specification on how the PCR-test is taken
29-11-2021	V8	1) Removed Eurofins Genomics from the list of recipients under section E as the Eurofins Genomics is no longer used.
03-01-2022	V9	1) Merged the privacy policies for Copenhagen Airport and Billund Airport. 2) Made the privacy policy applicable for all Danish airports where Falck performs COVID-19 testing. 3) Minor corrections to the text.